

EXHIBIT A

13 and perhaps some administrative
14 assistants/secretaries type, clerical types?
15 A. Yes.
16 Q. Okay. What was the basic function of the
17 call center at that point in time? What did the
18 CSRs do?
19 A. They answered all types of questions from
20 individual life insurance policyholders relating to
21 their policies, service they wanted provided, that
22 sort of thing. And we sent out appropriate forms
23 which -- when there was a transaction, they wanted
24 to do.

25 Q. Okay. This was an inbound call center?
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1 A. Yes.
2 Q. Were there particular product lines that
3 you were responsible for? Or was it a territory
4 or --
5 A. It started out geographically, very slow.
6 It took it several years before it became
7 nationwide, or we ended up taking half of the
8 country.
9 Q. All right. I am focusing on when you took
10 it over in 1986?
11 A. Okay. It was limited to this territory.
12 Q. Okay. But for all MetLife product lines?
13 A. No, only individual life insurance.
14 Q. Okay. So it started out for ILI for the
15 Tulsa --
16 A. Yes.
17 Q. -- territory?
18 A. Yes.
19 Q. Region, whatever it was called at the
20 time. Okay. Were there other call centers
21 elsewhere in the country, either for other product
22 lines or other territories?
23 A. By 1986, I'm not sure. There may have
24 been some that were evolving in the group side.
25 There were no others within personal insurance or
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1 individual life insurance.
2 Q. So at this point in time, the call center
3 was a service provided predominantly to
4 policyholders, customers of the Tulsa Region?
5 A. Yes.
6 Q. I would like to talk a little bit about
7 the evolution of the call center and the functions
8 of it, because I know it grew over this ten years,
9 this '86 to '96 period.
10 As of '96, when you ceased having
11 responsibilities for the call center, approximately
12 how many people worked in the call center?
13 A. Over 200.
14 Q. And what were the customer service
15 representatives, supervisors, clerical staff?
16 A. Telecommunications, training, staff
17 support, resource.
18 Q. Okay. What services were being provided
19 to policyholders by the Tulsa office.
20 A. Okay.
21 Q. I am now focused in 1996.
22 A. Okay.
23 Q. Then we will talk about how it got from
24 one spot to the other.
25 A. In 1996, the individual business call
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13 should call.
14 A. Yes.
15 Q. One of the functions of the CSR in your
16 area was if the call came to them to get routed, if
17 that was the issue --

18 A. Yes.
19 Q. -- to that particular call center.

20 A. (Affirmative head nod).
21 Q. Okay. How long had the Warwick facility
22 been in existence or when did it first come into
23 existence?

24 A. I believe it was around 1988.

25 Q. Okay. From 1986 until 1988, the first
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1 couple of years that you had responsibility for the
2 call center in Tulsa, did your responsibilities
3 remain the individual business piece in the Tulsa
4 territory?

5 A. Yes.

6 Q. Okay. And then Warwick came into
7 existence in approximately 1988 to do what?

8 A. There were many discussions during that
9 period of time as to the future of the call
10 centers, what their role was to be with an
11 individual insurance. There were moves where some
12 people wanted to consider establishing a call
13 center in each of our offices, but, basically, it
14 was agreed that the company needed to go with more
15 than one and the strategy at that time was to at
16 least start a second one in the Northeast.

17 Q. And Warwick performed similar functions
18 for the territory out of Warwick?

19 A. Yes.

20 Q. Okay. So then for a while, policyholders
21 in the Tulsa territory and policyholders in the
22 Warwick, the Northeast, had call centers but with
23 no call center specifically covering --

24 A. Yes.

25 Q. -- other areas of the country?
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1 A. Yes.

2 Q. Okay. That then changed at some point?

3 A. Yes.

4 Q. Do you recall, approximately, when that
5 changed? I mean, let me rephrase it.

6 I know that during this time period other
7 product lines are growing, --

8 A. Right.

9 Q. -- call centers. I am now focusing on the
10 ILI, the individual business piece.

11 A. The entire history is probably in that
12 folder that covered the advancement of
13 Teleservices.

14 Q. All right. We will come to that specific
15 document.

16 A. It was a slow, agonizing process to expand
17 it nationwide, and -- but it was through the early
18 Nineties.

19 Q. Okay. Were there at any point other call
20 centers handling the ILI individual business other
21 than Warwick and Tulsa up through this '95 time
22 period?

23 A. No.

24 Q. Okay. We are back up to 1986. I
25 understand your reporting relationships, I want to
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